

FILED

JUL 14 2023

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC  
BY CP DEP CLK

NO. 5:23-CR-229-D

UNITED STATES OF AMERICA )  
 )  
 v. ) CRIMINAL INFORMATION  
 )  
 GEORGIA TANEHAH CHARLEY HAYES )  
 )

The United States Attorney charges:

1. From on or about April 8, 2022, and continuing until on or about November 15, 2022, in the Eastern District of North Carolina and elsewhere, the defendant, GEORGIA TANEHAH CHARLEY HAYES, did knowingly combine, conspire, confederate, and agree with one or more persons, both known and unknown to the Grand Jury, to commit an offense against the United States, to wit: to knowingly devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, for which one or more conspirators transmitted and caused to be transmitted by means of wire communications in interstate commerce certain writings, signs, signals, pictures, and sounds, for the purpose of executing the scheme and artifice, in violation of Title 18, United States Code, Section 1343.

*Purpose of the Conspiracy*

2. The primary purpose of the conspiracy and the scheme and artifice was to obtain money and property from victims by using stolen credit card account information to purchase goods and services.

*Manner and Means*

3. The ways, manner and means used to accomplish the foregoing objective of the conspiracy included, but were not limited to the following:

4. It was part of the conspiracy and the scheme and artifice that the conspirators obtained stolen credit card account information from the dark web.

5. It was a further part of the conspiracy and the scheme and artifice that the conspirators made online purchases from national retail chains by and through wire communications in interstate commerce using stolen credit card account information.

6. It was a further part of the conspiracy and the scheme and artifice that HAYES provided her vehicle to co-conspirators to allow them to pick up fraudulently purchased items from national retail chains.

7. It was a further part of the conspiracy and scheme and artifice that HAYES received fraudulently obtained goods at her apartment in Raleigh, North Carolina.

All in violation of Title 18 United States Code, Section 1349.

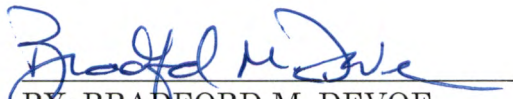
FORFEITURE NOTICE

Notice is hereby given that all right, title and interest in the property described herein is subject to forfeiture.

Upon conviction of any offense charged herein constituting “specified unlawful activity” (as defined in 18 U.S.C. §§ 1956(c)(7) and 1961(1)), or a conspiracy to commit such offense, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C), as made applicable by 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the said offense.

If any of the above-described forfeitable property, as a result of any act or omission of a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

MICHAEL F. EASLEY, JR.  
United States Attorney

  
BY: BRADFORD M. DEVOE  
Assistant United States Attorney